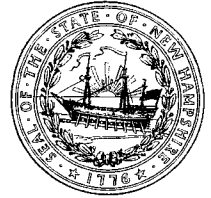




The State of New Hampshire
Department of Environmental Services



Michael P. Nolin
Commissioner

June 9, 2006

Mr. Pawel Helicki
Flat Rock Coatings, LLC
P.O. Box 777
New London, New Hampshire 03257

CERTIFIED MAIL (7005 1160 0004 7467 6888)
RETURN RECEIPT REQUESTED
LETTER OF DEFICIENCY
No. ARD 06-013
(Sta. S.)

RE: 111 Twistback Road, Claremont, NH

Dear Mr. Helicki:

On February 16, 2006, the New Hampshire Department of Environmental Services, Air Resources Division ("DES") conducted a compliance inspection at Flat Rock Coatings, LLC ("Flat Rock") at 111 Twistback Road in Claremont. The purpose of the inspection was to determine Flat Rock's compliance status with the N.H. Administrative Rules Env-A 100 *et seq.*, NH Rules Governing the Control of Air Pollution.

As a result of the inspection, this Letter of Deficiency ("LOD") is being sent to identify the following deficiency:

1. Env-A 1400, *Regulated Toxic Air Pollutants*, requires the owner or operator of a facility that emits a regulated toxic air pollutant ("RTAP") any time after May 8, 2001, to either demonstrate that the uncontrolled emissions of the RTAP do not exceed ambient air limits ("AALs"), as established in Env-A 1400, or apply for an air permit from DES that will limit emissions to ensure compliance with the AALs. If the owner or operator wants to demonstrate that the facility does not exceed any AALs so that a permit is not required, then a compliance demonstration must be performed in accordance with one of the methods provided in Env-A 1405. The owner or operator must retain documentation at the facility of that demonstration, as required by Env-A 1403.01(d), and provide it to DES upon request, as required by Env-A 1405.01(b).

Since Flat Rock applies primer and stains to clapboards and trimboards using a coating machine, Flat Rock may be emitting RTAPs such as Stoddard solvent, kerosene, ethylene glycol, and xylene. Flat Rock does not hold a DES air permit. At the time of the compliance inspection, Flat Rock could not provide documentation of compliance with the AALs, as requested by the DES inspector, pursuant to Env-A 1405.01(b).

DES believes that the deficiency can be resolved by Flat Rock taking the following actions:

- i. By **July 17, 2006**, submit to DES a compliance demonstration in accordance with Env-A 1405. If the demonstration shows that the facility is not in compliance with Env-A 1400, then Flat Rock shall also submit to DES by **July 17, 2006**, a permit application.



In the event compliance is not achieved within the time period indicated, DES may initiate formal action against Flat Rock, including issuing an order requiring the deficiency to be corrected, and/or referring this matter to the NH Department of Justice.

Please address all information to Barbara Hoffman, at the following address:

NHDES Air Resources Division
Enforcement Section
29 Hazen Drive
P.O. Box 95
Concord, NH 03302-0095

If you have questions regarding compliance with Env-A 100 *et seq.* or require further information, please contact Barbara Hoffman at (603) 271-7874, Air Resources Division, Compliance Bureau. A current copy of the Air Resource Division rules can be obtained from the DES website at <http://www.des.nh.gov/rules/air.htm> or by contacting the Public Information Center at (603) 271-2975.

Sincerely,


for  Pamela G. Monroe
Compliance Bureau Administrator
Air Resources Division

PGM/blh

cc: R. Kurowski, EPA Region 1
G. Hamel, DES Legal Unit Administrator
Guy Santagate, Claremont City Manager
AFS # 3301990161